



U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

January 13, 2016

BY ECF

The Honorable Edgardo Ramos United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States</u> v. <u>Ahmed Mohammed El Gammal</u>, 15 Cr. 588 (ER)

Dear Judge Ramos:

A status conference in this case is currently scheduled for January 15, 2016 at 12:30 p.m. Since the last conference in this matter, the Government has produced additional discovery to defense counsel, and anticipates the production of additional discovery to defense counsel shortly. Accordingly, the Government respectfully requests that the January 15, 2016 conference be adjourned for approximately four weeks to allow defense counsel time to review the newly-produced discovery and decide whether any motions are appropriate in this case.

The Government respectfully requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between January 15, 2016 and the new conference date. A proposed order excluding time is attached for the Court's consideration. I have spoken with the defendant's counsel and she has consented to this request in order to continuing reviewing discovery and decide whether any pretrial motions are appropriate in this case.

Respectfully submitted,

PREET BHARARA United States Attorney

By:

Andrea Surratt/Brendan Quigley/Negar Tekeei Assistant United States Attorneys

(212) 627 2402/2100

(212) 637-2493/2190

X	-	-	-	-	-	_	_	-	_	_	_	_	-	_	_	_	_	
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	--

UNITED STATES OF AMERICA : ORDER

-v.- : 15 Cr. 588 (ER)

AHMED EL GAMMAL, :

Defendant. :

Upon the application of the United States of America, by and through Preet Bharara, United States Attorney, Andrea L. Surratt, of counsel, and with the consent of counsel for the defendant, it is hereby ORDERED that the time from January 15, 2016, through ________, is hereby excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Court finds that the granting of such an exclusion best serves the ends of justice and outweighs the best interests of the public and the defendant in a speedy trial because it will allow the defendant to review discovery and determine whether any motions are appropriate.

SO ORDERED.

Dated: New York, New York
January ___, 2016

THE HONODADIE EDCADDO DAMOS

THE HONORABLE EDGARDO RAMOS UNITED STATES DISTRICT JUDGE